



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

### NOTICE OF PUBLIC MEETING AND PUBLIC HEARING

Preliminary Findings Regarding a  
Part 70 Operating Permit Renewal  
For VIM Recycling, Inc. located in Elkhart County  
**Air Permit No.: T039-24536-00538**

The Indiana Department of Environmental Management (IDEM) has received an application from VIM Recycling, Inc. for a Title V Operating Permit Renewal to continue operating its existing stationary landscape mulch, animal bedding and wood for fuel manufacturing operation located at 29861 Old U.S. Highway 33, Elkhart, Indiana 46516. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents that would allow the continued operation of the source. If the source operated 365 days a year, 24 hours a day, 7 days a week, the source could potentially release 5.94 tons per year of volatile organic compounds (VOCs), 2445.74 tons per year of coarse particulate matter (PM), 2443.29 tons per year of fine particulate matter (PM<sub>10</sub>/PM<sub>2.5</sub>), 17.00 tons per year of sulfur dioxide (SO<sub>2</sub>), 28.43 tons per year of carbon monoxide (CO), 126.46 tons per year of nitrogen oxides (NO<sub>x</sub>) and 0.13 tons per year of hazardous air pollutants (HAPs). The Title V requires the use of control equipment to control emissions from the source resulting in the potential to emit 29.87 tons per year of PM and 27.42 tons per year of PM<sub>10</sub>/PM<sub>2.5</sub>. Some conditions from previously issued permit approvals have been corrected, changed, or removed.

Copies of the permit application and IDEM's draft Title V and preliminary findings are available at:

Elkhart County Public Library  
300 S. 2nd Street  
Elkhart, Indiana 46516

and

IDEM Northern Regional Office  
220 West Colfax Ave.  
Suite 200  
South Bend, Indiana 46601

A copy of the preliminary findings is also available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

**IDEM, OAQ will hold a public meeting and conduct a public hearing to discuss the air permitting for this source on:**

**Thursday, November 20, at 5:30 p.m. (local time), at the  
Jintown North Elementary School  
30046 CR 16  
Elkhart In 46516-1099**

- At 5:30 PM, IDEM will hold a Public Meeting. Staff will explain the VIM Recycling, Inc. Part 70 Operating Permit renewal and answer questions from citizens in an informal setting. The Public Meeting will not include formal presentations, but will give the public an opportunity to talk informally with agency representatives.

- Following the Public Meeting, IDEM will conduct a formal public hearing on the draft permit. Citizens will have an opportunity to submit written comments and make formal statements concerning the draft permit. During this time, all statements will be documented and be considered part of the official record.

### **What will happen at the public meeting and public hearing?**

IDEM staff will explain the conditions of the draft air permit and answer questions from citizens in an informal setting at the Public Meeting. The Public Meeting will not include formal presentations, but will give the public an opportunity to ask questions, make statements, and discuss air pollution concerns with IDEM staff. You are welcome to present oral statements and comments and any supporting documentation as part of the official record at the Public Hearing, or, if you do not plan to attend this hearing, you may send your written comments to IDEM. All timely written comments received will be considered by IDEM when we make a decision to issue or deny the permit. IDEM has extended the public comment period to December 1, 2008. Timely written comments are those that are submitted to IDEM no later than December 1, 2008. Comments may be mailed, hand delivered, faxed or e-mailed. Comments that are most likely to affect final permit decision are those based on the rules and laws governing this permitting process, (326 Indiana Administrative Code 2), air quality issues, and technical issues. If you do not wish to comment but would like to be added to IDEM's mailing list to receive notice of future action related to this permit application, please contact IDEM. **Please refer to permit number T039-24536-00538.**

### **To Contact IDEM:**

Anne-Marie C. Hart  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 4-5401  
Or dial directly: (317) 234-5401  
**Fax: (317) 232-6749**  
E-mail: **amhart@idem.in.gov**

Speech and hearing impaired callers may contact the agency via the Indiana Relay Service at 1-800-743-3333.

### **What will happen after IDEM makes a decision?**

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different from the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251 and the IDEM Northern Regional Office, 220 W. Colfax Ave., Ste. 200, South Bend, Indiana 46601-1634. If you have any questions please contact Anne-Marie C. Hart or my staff at the above address.

**Matthew Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality**

For additional information about air permits and how you can participate, please see IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov).



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### NOTICE OF EXTENSION OF PUBLIC COMMENT PERIOD

#### Regarding the Renewal of a Part 70 Operating Permit

for VIM Recycling, Inc. in Elkhart County

Permit No. T039-24536-00538

The Indiana Department of Environmental Management (IDEM), has received an application from VIM Recycling, Inc. located at 29861 Old U.S. Highway 33, Elkhart, Indiana 46516 for a renewal of their Part 70 Operating Permit (T039-15593-00538) issued on January 24, 2003.

On July 12, 2008, IDEM had a public notice published in the Elkhart Truth initiating a 30-day public notice period for the draft permit renewal. The public comment period began on July 12, 2008, and was scheduled to end on August 11, 2008. Subsequently, IDEM extended the public comment period to September 10, 2008. **IDEM has extended the public comment period by an additional 30 days to October 10, 2008, in order to allow the public more time review the permit documents.**

If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow VIM Recycling, Inc. to continue to operate their existing source. If the source were to operate 24 hours a day, 7 days a week, 365 days a year, it would have the potential to emit the following: 2445.74 tons of pollutant PM, 2443.29 tons of pollutant PM<sub>10</sub>, 5.94 tons of pollutant VOC, 126.46 tons of pollutant NO<sub>x</sub>, 17.00 tons of pollutant SO<sub>2</sub>, 28.43 tons of pollutant CO, and 0.13 tons of hazardous air pollutants.

A copy of the permit application and IDEM's preliminary findings are available at:

**Elkhart County Public Library  
300 S. 2nd Street  
Elkhart, Indiana 46516**

and

**IDEM Northern Regional Office  
220 West Colfax Ave.  
Suite 200  
South Bend, Indiana 46601**

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Comments and supporting documentation should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number **T039-24536-00538** in all correspondence.

**Comments should be sent to:**

**Anne-Marie C. Hart**  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 4-5401  
Or dial directly: (317) 234-5401  
E-mail: [amhart@idem.in.gov](mailto:amhart@idem.in.gov)

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation** and **Permit Guide** on the Internet at: [www.idem.in.gov](http://www.idem.in.gov).

**What will happen after IDEM makes a decision?**

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251 IDEM Northern Regional Office.

If you have any questions please contact Anne-Marie C. Hart or my staff at the above address.

*Original signed by Matt Stuckey*

Matt Stuckey, Chief  
Permits Branch  
Office of Air Quality



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### NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

### Preliminary Findings Regarding the Renewal of a Part 70 Operating Permit

for VIM Recycling, Inc. in Elkhart County

Permit No. T039-24536-00538

The Indiana Department of Environmental Management (IDEM), has received an application from VIM Recycling, Inc. located at 29861 Old U.S. Highway 33, Elkhart, Indiana 46516 for a renewal of their Part 70 Operating Permit (T039-15593-00538) issued on January 24, 2003. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow VIM Recycling, Inc. to continue to operate their existing source. If the source were to operate 24 hours a day, 7 days a week, 365 days a year, it would have the potential to emit the following: 2445.74 tons of pollutant PM, 2443.29 tons of pollutant PM<sub>10</sub>, 5.94 tons of pollutant VOC, 126.46 tons of pollutant NO<sub>x</sub>, 17.00 tons of pollutant SO<sub>2</sub>, 28.43 tons of pollutant CO, and 0.13 tons of hazardous air pollutants.

This draft Part 70 Operating Permit does not contain any new equipment that would emit air pollutants, and no conditions from previously issued permits/approvals have been changed.

A copy of the permit application and IDEM's preliminary findings are available at:

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**Elkhart, Indiana 46516**

and

**IDEM Northern Regional Office**  
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**South Bend, Indiana 46601**

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

#### How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30<sup>th</sup> day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting,

you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number **T039-24536-00538** in all correspondence.

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**Anne-Marie C. Hart**  
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All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

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If you have any questions please contact Anne-Marie C. Hart of my staff at the above address.

Alfred C. Dumauual, Ph. D., Section Chief  
Permits Branch  
Office of Air Quality

ACH



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## Draft Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**VIM Recycling, Inc.**  
**29861 Old U.S. Highway 33**  
**Elkhart, Indiana 46516**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-24536-00538	
Issued by:	Issuance Date:
Alfred C. Dumauual, Ph. D., Section Chief Permits Branch Office of Air Quality	Expiration Date:

## TABLE OF CONTENTS

<b>A. SOURCE SUMMARY .....</b>	<b>5</b>
A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.4 Part 70 Permit Applicability [326 IAC 2-7-2]	
<b>B. GENERAL CONDITIONS .....</b>	<b>7</b>
B.1 Definitions [326 IAC 2-7-1]	
B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-7-7]	
B.5 Severability [326 IAC 2-7-5(5)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]	
B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]	
B.11 Emergency Provisions [326 IAC 2-7-16]	
B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]	
B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]	
B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]	
B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]	
B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]	
B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]	
B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]	
B.21 Source Modification Requirement [326 IAC 2-7-10.5]	
B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]	
B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	
B.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]	
<b>C. SOURCE OPERATION CONDITIONS .....</b>	<b>18</b>
<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Opacity [326 IAC 5-1]	
C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5 Fugitive Dust Emissions [326 IAC 6-4]	
C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
<b>Testing Requirements [326 IAC 2-7-6(1)]</b>	
C.7 Performance Testing [326 IAC 3-6]	



**Compliance Requirements [326 IAC 2-1.1-11]**

- C.8 Compliance Requirements [326 IAC 2-1.1-11]

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]**

- C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]  
C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]  
C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)]  
[326 IAC 2-7-6(1)]

**Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]**

- C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]  
C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]  
C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]  
C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]  
C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

- C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

**SECTION D.1 FACILITY OPERATION CONDITIONS ..... 25**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.1.1 PM and PM10 Limitation [326 IAC 2-2]  
D.1.2 Particulate Emissions Limitation [326 IAC 6-3-2]  
D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.1.4 Particulate Emissions

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.1.5 Visible Emissions Notations  
D.1.6 Parametric Monitoring  
D.1.7 Broken or Failed Bag Detection

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.1.8 Record Keeping Requirements

**D.2 FACILITY OPERATION CONDITIONS ..... 29**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.2.1 Fugitive Dust Emissions [326 IAC 6-4-1][326 IAC 6-4-2]  
D.2.2 Particulate Emissions Limitation [326 IAC 6-3-2]  
D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.2.4 Fugitive Dust Control [326 IAC 6-5]

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.2.5 Visible Emissions Notations  
D.2.6 Monitoring

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.2.7 Record Keeping Requirements

**D.3 FACILITY OPERATION CONDITIONS ..... 32**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.3.1 Nitrous Oxides (NO<sub>x</sub>) [326 IAC 2-2]
- D.3.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1]
- D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.3.4 Fuel Limitations
- D.3.5 Sulfur Content

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.3.6 Visible Emissions Notations

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.3.7 Record Keeping Requirements
- D.3.8 Reporting Requirements

Certification .....	35
Emergency Occurrence Report .....	36
Quarterly Report.....	38
Quarterly Deviation and Compliance Monitoring Report .....	39

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary landscape mulch, animal bedding and wood for fuel manufacturing operation.

Source Address:	29861 Old U.S. Highway 33, Elkhart, Indiana 46516
Mailing Address:	P.O. Box 808, Goshen, Indiana 46257
General Source Phone Number:	(800) 488-8813
SIC Code:	4953
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program
	Minor Source, under PSD and Emission Offset Rules
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) High Torque / Low Speed pre-shredder with a maximum capacity of 60 ton/hr, using a baghouse as control, constructed in 2008 and exhausting to stack designated as Collector 1X.
- (b) One (1) CBI (grizzly) wood grinder, identified as Grizzly, with a maximum capacity to grind seventy-five (75) tons of wood per hour, using a baghouse as control, constructed in 2000, and exhausting to stack designated Collector 1X, including associate storage piles;
- (c) One (1) material transporter and screen, identified as B, C Transport & Screen, with a maximum capacity to mechanically transport and screen seventy-five (75) tons of wood per hour, using a baghouse as control, constructed in 2000, and exhausting to stack designated Collector 2X, including associated storage piles;
- (d) One (1) CBI (mulch king) wood grinder, identified as Mulch King, with a maximum capacity to grind seventy-five (75) tons of wood per hour, using an air classifier, cyclone and baghouse as control, constructed in 2000, and exhausting to stack designated Collector 1X, including associated storage piles;
- (e) One (1) material transporter and screen, identified as A Transport & Screen, with a maximum capacity to mechanically transport and screen seventy-five (75) tons of wood per hour, using a baghouse for control, constructed in 2000, and exhausting to stack designated Collector 2X, including associated storage piles;
- (f) One (1) portable CBI (4800 M) wood grinder with screen separator, identified as CBI (4800 M), with a maximum capacity to grind twenty-five (25) tons of wood per hour outdoors on VIM property, using the Fugitive Dust Control Plan for control, constructed in 2000, including associated storage piles;

- (g) One (1) portable CBI (4800 M) wood grinder diesel motor, with a maximum capacity of eight hundred (800) horsepower per hour, constructed in 2000, and exhausting to a mobile engine exhaust when grinding outdoors;
- (h) One (1) portable Mobark wood grinder with screen separator, identified as Mobark, with a maximum capacity to grind twenty-five (25) tons of wood per hour outdoors on VIM property, using the Fugitive Dust Control Plan for control, constructed in 2004, including associated storage piles; and
- (i) One (1) portable Mobark wood grinder diesel motor, with a maximum capacity of three hundred twelve (312) horsepower per hour, constructed in 2000, and exhausting to a mobile engine exhaust when grinding outdoors.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T039-24536-00538, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

### B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### B.4 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

### B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain

certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

**B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.11 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
  - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]**

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this



permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]**

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- (a) All terms and conditions of permits established prior to T039-24536-00538 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,

- (2) revised under 326 IAC 2-7-10.5, or
- (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

**B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this

permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs**  
[326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
and  
  
United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
  
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
  - (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

**B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.25 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]**

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- (a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

**B.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]**

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For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

**C.2 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]**

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on June 25, 2008. The plan is included as Attachment A. The provisions of 326 IAC 6-5 are not federally enforceable.

**C.7 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.



**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-52 IGCN 1003  
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- (g) Indiana Licensed Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

### Testing Requirements [326 IAC 2-7-6(1)]

#### C.9 Performance Testing [326 IAC 3-6]

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### Compliance Requirements [326 IAC 2-1.1-11]

#### C.10 Compliance Requirements [326 IAC 2-1.1-11]

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

### Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

#### C.11 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

**C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

**C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]**

**C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

**C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

- (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

#### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) High Torque / Low Speed pre-shredder with a maximum capacity of 60 ton/hr, using a baghouse as control, constructed in 2008 and exhausting to stack designated as Collector 1X.
- (b) One (1) CBI (grizzly) wood grinder, identified as Grizzly, with a maximum capacity to grind seventy-five (75) tons of wood per hour, using a baghouse as control, constructed in 2000, and exhausting to stack designated Collector 1X, including associate storage piles;
- (c) One (1) material transporter and screen, identified as B, C Transport & Screen, with a maximum capacity to mechanically transport and screen seventy-five (75) tons of wood per hour, using a baghouse as control, constructed in 2000, and exhausting to stack designated Collector 2X, including associated storage piles;
- (d) One (1) CBI (mulch king) wood grinder, identified as Mulch King, with a maximum capacity to grind seventy-five (75) tons of wood per hour, using an air classifier, cyclone and baghouse as control, constructed in 2000, and exhausting to stack designated Collector 1X, including associated storage piles;
- (e) One (1) material transporter and screen, identified as A Transport & Screen, with a maximum capacity to mechanically transport and screen seventy-five (75) tons of wood per hour, using a baghouse for control, constructed in 2000, and exhausting to stack designated Collector 2X, including associated storage piles;

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 PM and PM<sub>10</sub> Limitation [326 IAC 2-2]

The following emissions units shall be limited as follows:

Emission Unit	Control Device	PM/PM <sub>10</sub> PSD Limit (lb/hr)
Pre-shredder	Collector 1x	34.36
Grizzly		
Mulch King		
B,C Transport and Screen	Collector 2x	21.47
A Transport and Screen		

Compliance with the above limits, combined with the potential to emit PM/PM<sub>10</sub> from other emission units at the source, shall limit the potential to emit PM/PM<sub>10</sub> from the entire source to less than 250 tons per twelve (12) consecutive month period and render 326 IAC 2-2 not applicable.

#### D.1.2 Particulate Matter [326 IAC 6-3]

- (a) The particulate from the indoor wood grinding operation shall be limited by the following:

Emission Unit	Process Weight Rate (tons per hour)	326 IAC 6-3-2 Limit (pounds per hour)
Pre-shredder	60	46.29
Grizzly	75	48.43
Mulch King	75	48.43

These pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

- (b) The particulate from the transport and screen equipment shall be limited by the following:

Emission Unit	Process Weight Rate (tons per hour)	326 IAC 6-3-2 Limit (pounds per hour)
B, C Transport and Screen	75	48.43
A Transport and Screen	75	48.43

These pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan of this permit, is required for these facilities and their control devices.

### Compliance Determination Requirements

#### D.1.4 Particulate Emissions

- (a) In order to comply with Condition D.1.1, the baghouses for particulate control shall be in operation and control emissions from the indoor wood grinding operation (pre-shredder, Grizzly and Mulch King) and the transport and screen equipment (B,C Transport and Screen, and A Transport and Screen) at all times the indoor wood grinding operation, and transport and screen equipment are in operation.
- (b) In order to comply with Condition D.1.2, the baghouses for particulate control shall be in operation and control emissions from the indoor wood grinding operation (pre-shredder, Grizzly and Mulch King) and the transport and screen equipment (B,C Transport and Screen, and A Transport and Screen) at all times the indoor wood grinding operation, and transport and screen equipment are in operation.
- (c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to



normal, and the results of any response actions taken up to the time of notification.

### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]**

#### **D.1.5 Visible Emissions Notations**

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- (a) Visible emission notations of the pre-shredder, Grizzly, Mulch King, B,C Transport and Screen, and A Transport and Screen stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### **D.1.6 Parametric Monitoring**

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- (a) The Permittee shall record the pressure drop across the baghouses used in conjunction with pre-shredder, Grizzly, Mulch King, B,C Transport and Screen, and A Transport and Screen when the units are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### **D.1.7 Broken or Failed Bag Detection [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process the feed to the process shall be shut down immediately until the failed has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.1.8 Record Keeping Requirement**

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- (a) To document compliance with Section C - Opacity and Condition D.1.5, the Permittee shall maintain daily records of the visible emission notations of the pre-shredder, Grizzly, Mulch King, B,C Transport and Screen, and A Transport and Screen stack exhausts. The Permittee shall include in its daily record when a visible notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain daily records of the pressure drop across each baghouse. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of pressure drop reading, (e.g. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (f) One (1) portable CBI (4800 M) wood grinder with screen separator, identified as CBI (4800 M), with a maximum capacity to grind twenty-five (25) tons of wood per hour outdoors on VIM property, using the Fugitive Dust Control Plan for control, constructed in 2000, including associated storage piles;
- (g) One (1) portable CBI (4800 M) wood grinder diesel motor, with a maximum capacity of eight hundred (800) horsepower per hour, constructed in 2000, and exhausting to a mobile engine exhaust when grinding outdoors;

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Fugitive Dust Emissions [326 IAC 6-4-1] [326 IAC 6-4-3]

Pursuant to CP039-12174-00538, issued August 21, 2000, and 326 IAC 6-4-2 (Fugitive Dust Emissions Limitations), emissions of particulate from outdoor wood grinding shall be in violation of 326 IAC 6-4 if any of the following criteria are violated:

- (a) A source or combination of sources which cause fugitive dust concentrations to exist greater than sixty-seven percent (67%) in excess of ambient upwind concentrations as determine by the following formula:

$$P = \frac{100(R-U)}{U}$$

Where P = percentage increase

R = number of particles of fugitive dust measured at the downward receptor site

U = number of particles of fugitive dust measured upwind of background site

- (b) The fugitive dust is comprised of fifty percent (50%) or more respirable dust, then the percent increase of dust concentration in subdivision (a) of this section shall be modified as follows:

$$P_R = (1.5 \pm N) \times P$$

Where P<sub>R</sub> = allowable percentage increase in dust concentration above backgrounds

N = fraction of fugitive dust that is respirable dust

P = no value greater than sixty-seven percent (67%)

- (c) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.
- (d) If the fugitive dust is visible crossing the boundary or property line or a source. This subdivision may be refuted by factual data expressed in subdivision (a), (b), or (c) of this section.

#### D.2.2 Particulate Matter [326 IAC 6-3-2]

The particulate from the Mobark outdoor wood grinder shall be limited by the following:

Emission Unit	Process Weight Rate (tons/hr)	Particulate Emission Limit (lb/hr)
Mobark wood grinder	25	35.43

This pounds per hour limit was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan of this permit, is required for these facilities.

### Compliance Determination Requirements

#### D.2.4 Fugitive Dust Control [326 IAC 6-5]

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The source shall control emissions of fugitive particulate from the outdoor grinder and screen through:

- (a) Spraying water, as necessary, during the grinding and screening of wood to prevent visible fugitive dust.
- (b) Grinding and screening of wood during periods when wind speeds, at the VIM Recycling property, measure no more than ten (10) miles per hour. Wind speed shall be measured hourly when grinding and screening outdoors. In the event of the wind speeds exceeding ten (10) miles per hour during grinding and screening outdoors, operation shall stop until wind speeds slow down to no more than ten (10) miles per hour.
- (c) Grinding and screening clean hardwood (A material), mixed woods (B material), and "recently live" wood only. "Recently live" wood is defined as wood, including trunk, branches and leaves, that has not been processed or cut into dimensional limber, and has been stored no longer than sixty (60) days onsite.

The Fugitive Dust Control Plan for this source is included as Attachment A.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.2.5 Visible Emissions Notations

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- (a) Pursuant to CP039-12174-00538, issued August 21, 2000, and to ensure compliance with Condition D.2.1, the source shall conduct continuous visual observations for fugitive dust, by a trained employee to assure that no visible particulate is crossing the VIM property line at any time while the outdoor grinder and screen are in operation.
- (b) A trained employee is an employee who has worked at the plant at least one (1) month and that has been trained in the appearance and characteristics of normal visible emissions for that specific process.

#### D.2.6 Monitoring

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In order to comply with Condition D.2.4, the source shall measure the wind speed prior to beginning outdoor grinding and/or screen and shall continue to measure wind speed hourly while grinding and/or screening outdoors.

### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.2.7 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.5, the Permittee shall maintain daily record of the visible observations of fugitive particulate emissions and the hours of operation of the CBI (4800M) and Mobark outdoor grinders and screens. The Permittee shall include

in its daily record when a visible observation is not taken and the reason for the lack of visible observation, (e.g. the process did not operate that day).

- (b) To document compliance with Condition D.2.5, the Permittee shall maintain a hourly record of the wind speed observation and the hours of operation of the CBI (4800M) and Mobark outdoor grinders and screens. The Permittee shall include in its daily record when an observation is not taken and the reason for the lack of observation, (e.g. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.3 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (g) One (1) portable CBI (4800 M) wood grinder diesel motor, with a maximum capacity of eight hundred (800) horsepower per hour, constructed in 2000, and exhausting to a mobile engine exhaust when grinding outdoors;
- (i) One (1) portable Mobark wood grinder diesel motor, with a maximum capacity of three hundred twelve (312) horsepower per hour, constructed in 2000, and exhausting to a mobile engine exhaust when grinding outdoors.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 Nitrous Oxides (NO<sub>x</sub>)

Pursuant to CP039-12174-00538, issued August 21, 2000, the total input of diesel fuel to the two (2) grinders' (CBI (4800M and Mobark) diesel motors shall be limited to the following (based on an assumed diesel heating value of 137,000 Btu per gallon):

- (a) CBI (4800M) grinder diesel motors: 147,168 gallons per twelve (12) consecutive month period with compliance determined at the end of each month; and
- (b) Mobark grinder diesel motors: 15,456 gallons per twelve (12) consecutive month period with compliance determined at the end of each month.

#### D.3.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1]

Pursuant to CP039-12174-00538, issued August 21, 2000, the sulfur content of the diesel fuel used in the two (2) grinders' diesel motors shall not exceed 0.5% by weight. Compliance with this limit shall limit sulfur dioxide emissions from the CBI (4800M) grinder and Mobark grinder diesel motors to less than twenty-five (25) tons per year and render the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) not applicable.

#### D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

### Compliance Determination Requirements

#### D.3.4 Fuel Limitations

Compliance with Condition D.3.1 shall be demonstrated within 30 days of the end of each month based on the fuel consumption for each grinder during the most recent month.

#### D.3.5 Sulfur Content

Compliance with Condition D.3.2 shall be determined utilizing one of the following options:

Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur content of the diesel fuel does not exceed 0.5% by:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;

- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
  - (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
  - (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.3.6 Visible Emissions Notations**

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- (a) Visible emission notations of the CBI (4800M) and Mobark grinder diesel motor stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.3.7 Record Keeping Requirements**

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- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records of the CBI (4800M) and Mobark grinder diesel motor monthly fuel usage.
- (b) To document compliance with Condition D.3.2, the Permittee shall maintain records of the sulfur content of the fuel oil used by the CBI (4800M) and Mobark grinder diesel motors.
- (c) To document compliance with Condition D.3.6, the Permittee shall maintain daily records of visible emission notations of the CBI (4800M) and Mobark diesel motor stack exhaust. The Permittee shall include in its daily record when a visible notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.3.8 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit,

using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: VIM Recycling, Inc.  
Source Address: 29861 Old U.S. Highway 33, Elkhart, Indiana 46516  
Mailing Address: P.O. Box 808, Goshen, Indiana 46257  
Part 70 Permit No.: T039-24536-00538

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter \_\_\_\_\_.
- ☐ Test Result (specify) \_\_\_\_\_.
- ☐ Report (specify) \_\_\_\_\_.
- ☐ Notification (specify) \_\_\_\_\_.
- ☐ Affidavit (specify) \_\_\_\_\_.
- ☐ Other (specify) \_\_\_\_\_.

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: VIM Recycling, Inc.  
Source Address: 29861 Old U.S. Highway 33, Elkhart, Indiana 46516  
Mailing Address: P.O. Box 808, Goshen, Indiana 46257  
Part 70 Permit No.: T039-24536-00538

**This form consists of 2 pages**

**Page 1 of 2**

- ☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: VIM Recycling, Inc.  
Source Address: 29861 Old U.S. Highway 33, Elkhart, Indiana 46516  
Mailing Address: P.O. Box 808, Goshen, Indiana 46257  
Part 70 Permit No.: T039-24536-00538  
Facility: CBI (4800M) and Mobark wood grinder diesel motors  
Parameter: Fuel Usage  
Limit: 147,168 gallons per twelve (12) consecutive month period with compliance determined at the end of each month for the CBI (4800M) grinder.  
15,456 gallons per twelve (12) consecutive month period with compliance determined at the end of each month for the Mobark grinder

QUARTER :

YEAR:

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
	CBI (4800)M	Mobark	CBI (4800)M	Mobark	CBI (4800)M	Mobark
Month 1						
Month 2						
Month 3						

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_.

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: VIM Recycling, Inc.  
Source Address: 29861 Old U.S. Highway 33, Elkhart, Indiana 46516  
Mailing Address: P.O. Box 808, Goshen, Indiana 46257  
Part 70 Permit No.: T039-24536-00538

**Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_**

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Attachment A

### Fugitive Dust Control Plan Approved July 2, 2008

VIM Recycling, Inc.  
29861 Old U.S. Highway 33  
Elkhart, Indiana 46516

#### **Section 1 - Introduction**

The following control plan, when implemented, is designed to reduce uncontrolled fugitive dust generated from paved roadways and areas, unpaved roadways and areas, wood recyclable material piles, and grinding and screening of wood outdoors in order to prevent fugitive dust from crossing the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions Limitations).

The plan shall be implemented on a year-round basis until such a time as another plan is approved or ordered by the Indiana Department of Environmental Management.

The person on site who is responsible for implementing the plan is:

VIM Recycling, Inc.  
Kenneth R. Will  
P.O. Box 808  
Goshen, Indiana 46527-0808

#### **Section 2 - Outdoor Grinding and Screening**

The following shall control fugitive particulate matter emissions from the outdoor grinding and screening of wood recyclable material:

- (a) Spraying water, as necessary, during the grinding and screening operation to prevent visible fugitive dust.
- (b) Grinding and screening of wood during periods when wind speeds, at the VIM Recycling property, measure no more than ten (10) miles per hour. Wind speed shall be measured hourly when grinding and screening outdoors. In the event of the wind speeds exceeding ten (10) miles per hour during grinding and screening outdoors, operation shall stop until wind speeds slow down to no more than ten (10) miles per hour.
- (c) Grinding and screening clean hardwood (A material), mixed woods (B material), and "recently live" wood<sup>1</sup> only.

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<sup>1</sup> "Recently live" wood - wood, including trunk, branches, and leaves, that has not been processed or cut into dimensional lumber, and has been stored no longer than sixty (60) days onsite.

### **Section 3 - Paved Roads and Areas**

Dust from paved roads and areas will be controlled by sweeping and shall be performed every 14 days or more often to prevent visible fugitive dust from crossing the VIM property line, as determined by a trained employee, from these areas. A trained employee is defined as an employee that has worked at the source at least one (1) month and has been trained to determine whether fugitive dust emissions from paved roads and areas are in compliance with 326 IAC 6-4 (Fugitive Dust Emissions Limitations). Records of sweeping will be required.

Exceptions - Cleaning of paved roads and areas may be delayed by one day when:

- (a) 0.1 or more inches of rain has accumulated during the 24-hour period prior to the scheduled cleaning.
- (b) The road segments or areas is closed or abandoned. Abandoned roads or areas will be barricaded to prevent vehicle access.
- (c) It is raining at the time of the scheduled cleaning.

### **Section 4 - Unpaved Roads and Areas**

Unpaved roads and areas at the facility shall be sprayed with water, as necessary, for dust control to prevent fugitive dust from crossing the VIM property line, as determined by a trained employee, from these areas. A trained employee shall perform visual observations for fugitive dust twice daily and records shall be kept of these observations in the journal. A trained employee is defined as an employee that has worked at the source at least one (1) month and has been trained to determine whether fugitive dust emissions from unpaved roads and areas are in compliance with 326 IAC 6-4 (Fugitive Dust Emissions Limitations). Records of spraying water onto unpaved roads and areas shall also be required.

Exceptions - Treating of unpaved roads and areas may be delayed by one day when:

- (a) 0.1 or more inches of rain has accumulated during the 24-hour period prior to the scheduled cleaning.
- (b) The road segments or areas are frozen or covered by ice, snow, or standing water.
- (c) The road segments or areas is closed or abandoned. Abandoned roads or areas will be barricaded to prevent vehicles from traveling on the roads or areas.

### **Section 5 - Open Wood Recyclable Material Piles**

Open wood recyclable material piles will consist of only landscape mulch and scrap wood. The use of water as a dust suppressant shall be the primary means of dust control. The water shall be applied, as necessary, to the wood recyclable material piles to prevent emission of fugitive particulate matter from crossing the VIM property line, as determined by a trained employee, from these areas. A trained employee shall perform visual observations for fugitive dust twice daily and a record shall be kept of these observations in the journal. Records of spraying water onto piles shall also be required.

Exceptions - Treating of wood recyclable material piles may be delayed by one day when:

- (a) 0.1 or more inches of rain has accumulated during the 24-hour period prior to the scheduled cleaning.
- (b) The storage piles are frozen or covered by ice or snow.



## **Section 6 - Material Handling**

Material handling equipment will be used to maintain the wood recyclable material piles. Fugitive particulate matter from loading and unloading of outdoor wood recyclable material piles shall be controlled by the following: spraying with water, as necessary, when determined by a trained employee, and reduction of the free fall distance between the front-end loader and truck.

Fugitive particulate matter control from the loading and unloading of indoor storage piles shall be accomplished by the following: trucks shall be loaded with materials stored in the VIM building only within the building.

## **Section 7 - Monitoring and Record Keeping**

Records shall be kept in a journal, which will be updated daily by the responsible official. The journals shall be kept in storage for a minimum of three (3) years and shall be available for inspection or copying upon reasonable prior notice. The following information will be required in the journal with each entry:

Grinding and Screening Outdoors:

- (a) Name of trained employee making observations
- (b) Wind speed prior to startup of grinding and screening outdoors
- (c) Hourly readings of wind speed while grinding and screening outdoors
- (d) Hours of operation for grinding and screening in a day

Paved Roads and Areas

- (a) Name of trained employee making observations
- (b) Record of the dates when areas are swept

Unpaved Roads and Areas and Wood Recyclable Material Piles

- (a) Name of trained employee making observations
- (b) Date and time the observations were made
- (c) Date and time when water is applied

## **Section 8 - Compliance Schedule**

This plan has been fully implemented and adherence to the plan will continue until revisions to the plan have been approved by IDEM.

**Indiana Department of Environmental Management**  
**Office of Air Quality**

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>VIM Recycling, Inc.</b>
<b>Source Location:</b>	<b>29861 Old U.S. Highway 33, Elkhart, Indiana 46516</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>2499</b>
<b>Permit Renewal No.:</b>	<b>T039-24536-00538</b>
<b>Permit Reviewer:</b>	<b>Anne-Marie C. Hart</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from VIM Recycling, Inc. relating to the operation of a landscape mulch, animal bedding and wood for fuel manufacturing operation that uses recycled wood as raw material.

**History**

VIM Recycling, Inc. was issued a Part 70 Operating Permit (T039-15593-00538) on January 24, 2003. On March 30, 2007, VIM Recycling, Inc. submitted an application to the OAQ requesting to renew its operating permit. On February 1, 2007, VIM Recycling, Inc. submitted an application to revise their Fugitive Dust Control Plan. This application was combined into this Part 70 Operating Permit renewal application.

On June 14, 2007, a fire occurred at VIM Recycling, Inc. in which the one (1) CBI wood grinder and screen separator, identified as Grizzly, the one (1) "B" and "C" material transporter and screen, identified as B, C Transport & Screen, the one (1) CBI wood grinder, identified as Mulch King, and the one (1) "A" material transporter and screen, identified as A Transport & Screen were destroyed. These units were essential to the grinding operations at VIM Recycling, Inc. Only the Mobark wood grinder, identified as Mobark, used to grind material outdoors on VIM property, was not destroyed. Pursuant to 326 IAC 2-7-10.5(b), VIM Recycling, Inc. may repair or replace the units destroyed in the fire without prior approval from IDEM, OAQ, if the repair or replacement results in a potential to emit less than or equal to the emissions unit(s) being repaired or replaced. VIM Recycling, Inc. intends to repair or replace the destroyed emissions units pursuant to 326 IAC 2-7-10.5(b).

As part of Agreed Order (Case No. 2006-15827-S) to remove "C" grade waste from the site by September 30, 2008, the Indiana Department of Environmental Management, Northern Regional Office, Office of Legal Counsel and Office of Air Quality have agreed to temporarily allow VIM Recycling, Inc. to shred "C" grade waste using the Mobark wood grinder, identified as Mobark.

The Agreed Order schedule for removal of "C" grade waste, with an inception date of January 31, 2006, is as follows:

- (a) Respondent shall remove 4,675 tons on or before July 31, 2007;
- (b) Respondent shall remove an additional 4,675 tons (cumulative total of 9,359 tons) on or before December 31, 2007;
- (c) Respondent shall remove an additional 4,675 tons (cumulative total of 14,025 tons) on or before May 31, 2008;

- (d) Respondent shall remove any and all remaining "C grade" solid waste on or before September 30, 2008.

The Agreed Order shall remain in effect until the source is able to remove all "C" grade waste.

#### **Permitted Emission Units and Pollution Control Equipment**

- (a) One (1) High Torque / Low Speed pre-shredder with a maximum capacity of 60 ton/hr, using a baghouse as control, constructed in 2008 and exhausting to stack designated as Collector 1X.
- (b) One (1) CBI (grizzly) wood grinder, identified as Grizzly, with a maximum capacity to grind seventy-five (75) tons of wood per hour, using a baghouse as control, constructed in 2000, and exhausting to stack designated Collector 1X, including associate storage piles;
- (c) One (1) material transporter and screen, identified as B, C Transport & Screen, with a maximum capacity to mechanically transport and screen seventy-five (75) tons of wood per hour, using a baghouse as control, constructed in 2000, and exhausting to stack designated Collector 2X, including associated storage piles;
- (d) One (1) CBI (mulch king) wood grinder, identified as Mulch King, with a maximum capacity to grind seventy-five (75) tons of wood per hour, using an air classifier, cyclone and baghouse as control, constructed in 2000, and exhausting to stack designated Collector 1X, including associated storage piles;
- (e) One (1) material transporter and screen, identified as A Transport & Screen, with a maximum capacity to mechanically transport and screen seventy-five (75) tons of wood per hour, using a baghouse for control, constructed in 2000, and exhausting to stack designated Collector 2X, including associated storage piles;
- (f) One (1) portable CBI (4800 M) wood grinder with screen separator, identified as CBI (4800 M), with a maximum capacity to grind twenty-five (25) tons of wood per hour outdoors on VIM property, using the Fugitive Dust Control Plan for control, constructed in 2000, including associated storage piles;
- (g) One (1) portable CBI (4800 M) wood grinder diesel motor, with a maximum capacity of eight hundred (800) horsepower per hour, constructed in 2000, and exhausting to a mobile engine exhaust when grinding outdoors;
- (h) One (1) portable Mobark wood grinder with screen separator, identified as Mobark, with a maximum capacity to grind twenty-five (25) tons of wood per hour outdoors on VIM property, using the Fugitive Dust Control Plan for control, constructed in 2004, including associated storage piles; and
- (i) One (1) portable Mobark wood grinder diesel motor, with a maximum capacity of three hundred twelve (312) horsepower per hour, constructed in 2000, and exhausting to a mobile engine exhaust when grinding outdoors.

#### **Existing Approvals**

Since the issuance of the Part 70 Operating Permit T036-15593-00538 on January 24, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) Minor Source Modification No. T036-20302-00538 issued on January 31, 2005; and

- (b) Minor Permit Modification No. T036-19895-00538 issued on Marcy 27, 2006.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

#### Enforcement Issue

There are no enforcement actions pending. However, the following Agreed Orders have been issued to VIM Recycling, Inc.:

- (a) 2000-9849-A signed August 23, 2001
- (b) 2002-12587-A signed June 26, 2003
- (c) 2003-13510-A signed May 3, 2004
- (d) 2005-14831-A signed December 29, 2006.

#### Emission Calculations

See Appendix A of this document for detailed emission calculations.

#### County Attainment Status

The source is located in Elkhart County

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective July 19, 2007, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

- (a) Ozone Standards
  - (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
  - (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.
  - (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
  - (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC

and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM<sub>2.5</sub>**  
Elkhart County has been classified as attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions.
- (c) **Other Criteria Pollutants**  
Elkhart County has been classified as attainment or unclassifiable in Indiana for SO<sub>2</sub>, CO, PM<sub>10</sub>, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

#### **Unrestricted Potential Emissions**

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of NO<sub>x</sub> and PM<sub>10</sub> is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (d) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

#### **Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

## Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential to Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Indoor Wood Grinding Operations**	15.02	15.02	0.00	0.00	0.00	0.00	0.00
Transport and Screen Equipment**	9.39	9.39	0.00	0.00	0.00	0.00	0.00
Diesel Fuel Combustion (312 HP)***	3.01	3.01	2.80	3.44	9.13	<40	Negligible
Diesel Fuel Combustion (800 HP)***	2.45	0.00	14.20	2.50	19.30		Negligible
Haybuster Grinder*	38.46	38.46	0.00	0.00	0.00	0.00	0.00
Storage Piles*	15.97	15.97	0.00	0.00	0.00	0.00	0.00
Storage Handling*	0.41	0.19	0.00	0.00	0.00	0.00	0.00
Roads*	109.71	32.99	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>29.87</b>	<b>27.42</b>	<b>17.00</b>	<b>5.94</b>	<b>28.43</b>	<b>&lt;40</b>	<b>Negligible</b>
<b>Major Source Threshold</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>10 single/ 25 combined</b>

\* Indicates a fugitive emissions source and not counted toward total emissions

\*\* Indicates controlled emissions to avoid PSD applicability. Uncontrolled emissions for PM/PM<sub>10</sub> from Indoor Wood Grinding Operations = 1501.71 and from Transport and Screen Equipment = 938.57

\*\*\* NO<sub>x</sub> emissions from fuel limit pursuant to CP 039-12174-00538, issued August 21, 2000

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

## Federal Rule Applicability

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to existing emission units that involve a pollutant-specific emission unit and meet the following criteria:
  - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;

- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Indoor Wood Grinding Operations - PM/PM <sub>10</sub>	Collector 1x	Y	1501.71	15.02	100	Y	N
Transport and Screen - PM/PM <sub>10</sub>	Collector 2x	Y	938.57	9.39	100	Y	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the pre-shredder, the Grizzly, the Mulch King, the A Transport and Screen, and the B, and C Transport and Screen for PM upon issuance of the Title V Renewal. A CAM plan will be incorporated into this Part 70 permit renewal.

#### State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

- (a) The potential uncontrolled PM/PM<sub>10</sub> emissions are greater than 250 tons per year and the source is not one of the 28 source categories.

The following emissions units shall be limited as follows:

Emission Unit	Control Device	PM/PM <sub>10</sub> PSD Limit (lb/hr)
Pre-shredder	Collector 1x	34.36
Grizzly		
Mulch King		
B,C Transport and Screen	Collector 2x	21.47
A Transport and Screen		

Compliance with the above limits, combined with the potential to emit PM/PM<sub>10</sub> from other emission units at the source, shall limit the potential to emit PM/PM<sub>10</sub> from the entire source to less than 250 tons per twelve (12) consecutive month period and render 326 IAC 2-2 not applicable.

- (b) Pursuant to CP039-12174-00538, issued August 21, 2000, the total input of the diesel fuel for the two (2) grinders' (CBI (4800M) and Mobark ) diesel motors shall be limited to the following, based on an assumed diesel heating value of 137,000 Btu per gallon):

- (1) CBI (4800M) grinder diesel motor: 147,168 gallons per twelve (12) consecutive month period with compliance determined at the end of each month; and

- (2) Mobark grinder diesel motor: 15,456 gallons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits shall limit the potential to emit NO<sub>x</sub> for each grinder diesel motor to less than forty (40) tons per year. These limits allow VIM Recycling, Inc. to add NO<sub>x</sub> emitting units to the source without affecting the PSD minor limits.

- (c) Pursuant to CP039-12174-00538, the sulfur content of the diesel fuel shall not exceed 0.5%.

This limit allows for the source to maintain its PSD minor status.

**326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2007 and every 3 years. Therefore, the next emission statement for this source must be submitted by July 1, 2010. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

**326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**

This source is subject to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) because it is a source of fugitive dust and was constructed after 1985. Pursuant to this rule, the source shall control fugitive emissions according to the Fugitive Dust Control Plan submitted by VIM Recycling, Inc. and approved with the issuance of this renewal. This plan is included as Attachment A to the permit. Allowable wood for outdoor grinding include "A" material, defined as clean hardwood, and "B" material, defined as mixed woods. VIM Recycling, Inc., is allowed to grind "C" material under enforcement discretion only and will no longer be allowed to grind "C" material once it has been removed from the source.

**State Rule Applicability – Individual Facilities**

**326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

The operation of the diesel motors associated with wood grinders identified as CBI (4800M) and Mobark will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.



326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), emissions of particulate shall be limited as follows:

- (a) The particulate from the indoor wood grinding operation shall be limited by the following:

Emission Unit	Process Weight Rate (tons per hour)	326 IAC 6-3-2 Limit (pounds per hour)
Pre-shredder	60	46.29
Grizzly	75	48.43
Mulch King	75	48.43

The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

In order to comply with these limits, the baghouse, identified as Collector 1x, shall be in operation and control emissions from the indoor wood grinding operations at all times the indoor wood grinding operation is in operation.

- (b) The particulate from the transport and screen equipment shall be limited by the following:

Emission Unit	Process Weight Rate (tons per hour)	326 IAC 6-3-2 Limit (pounds per hour)
B, C Transport and Screen	75	48.43
A Transport and Screen	75	48.43

The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

In order to comply with these limits, the baghouse, identified as Collector 2x, shall be in operation and control emissions from the transport and screen equipment at all times the transport and screen equipment is in operation.

- (c) The particulate from the Mobark outdoor wood grinder shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Emission Unit	Process Weight Rate (tons/hr)	Particulate Emission Limit (lb/hr)
Mobark wood grinder	25	35.43

In order to comply with this limit, the Fugitive Dust Control Plan shall be in operation and control emissions from the Mobark wood grinder at all times the Mobark wood grinder is in operation.

**326 IAC 6-4-2 (Fugitive Dust Emissions Limitations)**

Pursuant to CP039-12174-00538, issued August 21, 2000, and 326 IAC 6-4-2 (Fugitive Dust Emissions Limitations), emissions of particulate from outdoor wood grinding shall be in violation of 326 IAC 6-4 if any of the following criteria are violated:

- (a) A source or combination of sources which cause to exist fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations as determined by the following formula:

$$P = \frac{100(R-U)}{U}$$

Where P = percentage increase

R = number of particles of fugitive dust measured at the downward receptor site

U = number of particles of fugitive dust measured upwind of background site

- (b) The fugitive dust is comprised of fifty percent (50%) or more respirable dust, then the percent increase of dust concentration in subdivision (a) of this section shall be modified as follows:

$$P_R = (1.5 \pm N) \times P$$

Where  $P_R$  = allowable percentage increase in dust concentration above backgrounds

N = fraction of fugitive dust that is respirable dust

P = no value greater than sixty-seven percent (67%)

- (c) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.
- (d) If the fugitive dust is visible crossing the boundary or property line or a source. This subdivision may be refuted by factual data expressed in subdivision (a), (b), or (c) of this section.

**326 IAC 7-1.1 (Sulfur Dioxide Limitations)**

Pursuant to CP039-12174-00538, issued August 21, 2000, the sulfur content of the diesel fuel used in the two (2) grinders' diesel motors shall not exceed 0.5% by weight. Compliance with this limit shall limit sulfur dioxide emissions from the CBI (4800M) grinder and Mobark grinder diesel motors to less than twenty-five (25) tons per year and render the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) not applicable.

**Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The indoor wood grinding operation (pre-shredder, Grizzly and Mulch King) and transport and screen equipment (B, C Transport and Screen, and A Transport and Screen) have applicable compliance monitoring conditions as specified below:
  - (a) Visible emission notations of the indoor wood grinding operation and transport and screen equipment stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
  - (b) The Permittee shall record the pressure drop across the baghouses used in conjunction with indoor wood grinding operation and the transport and screen equipment drop points at least once per day when the indoor wood grinding operation and the transport and screen equipment is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water, or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
  - (c) An inspection shall be performed during the last month of each quarter of all bags controlling the indoor wood grinding operation and transport and screen equipment. All defective bags shall be replaced.
  - (d) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A, signed on August 23, 2001, the Permittee shall inspect all ground wood material stored outside for signs of spontaneous combustion. Any fire discovered shall be extinguished immediately.
2. The portable CBI wood grinder with screen separator (4800M) and portable Mobark wood grinder with screen separator (Mobark), both grinding wood outdoors, have applicable compliance monitoring conditions as specified below:

- (a) The Permittee shall conduct continuous visual observations, by a trained employee to assure that no visible particulate is crossing the VIM property line at any time while the processes are in operation.
  - (b) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
  - (c) The Permittee shall measure the wind speed prior to beginning outdoor grinding and shall continue to measure wind speed hourly while grinding outdoors.
  - (d) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A, signed on August 23, 2001, the Permittee shall inspect all ground wood material stored outside for signs of spontaneous combustion. Any fire discovered shall be extinguished immediately.
3. The CBI wood grinder (4800M) and Mobark wood grinder diesel motors both have applicable compliance monitoring conditions as specified below:
  - (a) Visible emission notations of the CBI (4800M) and Mobark grinder diesel motor stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Control Device	Parameter	Frequency	Range	Excursions and Exceedances
Baghouse - Collector 1x	Water Pressure Drop	Daily	3 to 6 inches	Response Steps
	Visible Emissions		Normal-Abnormal	
Baghouse - Collector 2x	Water Pressure Drop	Daily	3 to 6 inches	Response Steps
	Visible Emissions		Normal-Abnormal	

These monitoring conditions are necessary because the baghouses, identified as Collector 1x and Collector 2x, for the indoor wood grinding operation and the transport and screen equipment must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 2-7 (Part 70), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 64 (CAM Requirements).

## **Recommendation**

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on March 30, 2007.

## **Conclusion**

The operation of this landscape mulch, animal bedding and wood for fuel manufacturing operation that uses recycled wood as raw material shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T039-24536-00538.

**Appendix A: Emission Calculations**  
**Total Emissions Summary**

Page 1 of 7 TSD App A

**Company Name:** VIM Recycling  
**Address City IN Zip:** 29861 Old U.S. Highway 33, Elkhart, Indiana 46516  
**Permit Number:** T039-24536-00538  
**Plt ID:** 039-00538  
**Reviewer:** Anne-Marie C. Hart  
**Date:** November 5, 2007

Process	tons/year						
	PM	PM10	VOC	NOx	SO <sub>2</sub>	CO	HAPs
Indoor Wood Grinding Operations (Uncontrolled)	1501.71	1501.71	0.00	0.00	0.00	0.00	0.00
Indoor Woodgrinding Operations (Controlled)	15.02	15.02	0.00	0.00	0.00	0.00	0.00
Transport and Screen (Uncontrolled)	938.57	938.57	0.00	0.00	0.00	0.00	0.00
Transport and Screen (Controlled)	9.39	9.39	0.00	0.00	0.00	0.00	0.00
Diesel Fuel Combustion 312 HP	3.01	3.01	3.44	42.36	2.80	9.13	3.58E-02
Diesel Fuel Combustion 800 HP	2.45	0.00	2.50	84.10	14.20	19.30	9.17E-02
Fugitive Emissions from Storage Piles	15.97	15.97	0.00	0.00	0.00	0.00	0.00
Fugitive Emissions from Storage Handling	0.41	0.19	0.00	0.00	0.00	0.00	0.00
Fugitive Emissions from Roads	109.71	32.99	0.00	0.00	0.00	0.00	0.00
Mobark Wood Grinder	38.46	38.46	0.00	0.00	0.00	0.00	0.00
Total Uncontrolled Emissions	2445.74	2443.29	5.94	126.46	17.00	28.43	1.28E-01
<b>Total Controlled Emissions</b>	<b>29.87</b>	<b>27.42</b>	<b>5.94</b>	<b>126.46</b>	<b>17.00</b>	<b>28.43</b>	<b>1.28E-01</b>

**Appendix A: Emission Calculations**

**Particulate Matter Emissions**

**Woodworking Operations**

**Company Name:** VIM Recycling

**Address City IN Zip:** 29861 Old U.S. Highway 33, Elkhart, Indiana 46516

**Permit Number:** T039-24536-00538

**Plt ID:** 039-00538

**Reviewer:** Anne-Marie C. Hart

**Date:** November 5, 2007

	Grain Loading (gr/dscf)	Air Flow (acfm)	Baghouse Efficiency	Potential Controlled Emissions (lb/hr)	Potential Controlled Emissions (tons/year)	Potential Uncontrolled Emissions (lb/hr)	Potential Uncontrolled Emissions (tons/year)
Collector 1x	0.005	80,000	99%	3.43	15.02	342.86	1501.71
Collector 2x	0.005	50,000	99%	2.14	9.39	214.29	938.57
<b>Total</b>				<b>5.57</b>	<b>24.40</b>	<b>557.14</b>	<b>2440.29</b>

**Methodology**

Potential Controlled Emissions (lb/hr) = Grain Loading (gr/dscf) x Air Flow (acfm) x 60 (min/hour) x (1 lb/7000 grains)

Potential Controlled Emissions (tons/year) = Potential Controlled Emissions (lb/hr) x 8760 (hours/year) x (1 ton/2000 lbs)

Potential Uncontrolled Emissions (lb/hr) = Potential Controlled Emissions (lb/hr) / (1-99%)

Potential Uncontrolled Emissions (ton/year) = Potential Uncontrolled Emissions (lb/hr) x 8760 (hours/year) x (1 ton/2000 lbs)

**Appendix A: Emission Calculations**  
**Internal Combustion Engines - Diesel Fuel**

Page 3 of 7 TSD App A

**Company Name:** VIM Recycling  
**Address City IN Zip:** 29861 Old U.S. Highway 33, Elkhart, Indiana 46516  
**Permit Number:** T039-24536-00538  
**Plt ID:** 039-00538  
**Reviewer:** Anne-Marie C. Hart  
**Date:** November 5, 2007

Heat Input Capacity Horsepower (hp)	Potential Throughput hp-hr/yr	Heat Input Capacity MMBtu/hr
312.0	2733120.0	2.184

	Pollutant					
Emission Factor in lb/hp-hr	PM*	PM10*	SO2	NOx	VOC	CO
	0.0022	0.0022	0.0021	0.0310	0.0025	0.0067
Potential Emission in tons/yr	3.01	3.01	2.80	42.36	3.44	9.13

**Methodology**

Potential Throughput (hp-hr/yr) = hp \* 8760 hr/yr

Use a conversion factor of 7,000 Btu per hp-hr to convert from horsepower to Btu/hr, unless the source gives you a source-specific brake-specific fuel consumption. (AP-42, Footnote a, Table 3.3-1)

Emission Factors are from AP42 (Supplement B 10/96), Table 3.3-2

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] \* 8760 hr/yr / (2,000 lb/ton )

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton )

\*PM emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

**HAP Emissions**

	Pollutant					
Emission Factor in lb/hp-hr	Benzene	Toluene	Xylene	Napthalene	Formaldehyde	Acetaldehyde
	9.33E-04	4.90E-04	2.85E-04	8.48E-05	1.18E-03	7.67E-04
Potential Emission in tons/yr	8.93E-03	4.69E-03	2.73E-03	8.11E-04	1.13E-02	7.34E-03
	Total HAPs					3.58E-02

**Methodology**

Emission Factors from AP-42, Ch. 3.3, Table 3.3-2

Emission (ton/year) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760 (hour/year) x (1 ton/2000 lbs)



**Appendix A: Emission Calculations  
Diesel Fuel Combustion**

Page 4 of 7 TSD App A

**Company Name:** VIM Recycling  
**Address City IN Zip:** 29861 Old U.S. Highway 33, Elkhart, Indiana 46516  
**Permit Number:** T039-24536-00538  
**Pit ID:** 039-00538  
**Reviewer:** Anne-Marie C. Hart  
**Date:** November 5, 2007

Heat Input Capacity  
Horsepower (hp)

Potential Throughput  
hp-hr/yr

S= 0.5 = WEIGHT % SULFUR

Heat Capacity  
MMBtu/hr

800.0

7008000.0

5.6

	Pollutant					
Emission Factor in lb/hp-hr	PM*	PM10*	SO2	NOx	VOC	CO
	0.0007	not provided	0.0040 (.00809S)	0.024 **see below	0.00071	0.00550
Potential Emission in tons/yr	2.5	0.0	14.2	84.1	2.5	19.3

\*\*NOx emission factor: uncontrolled = 0.024 lb/hp-hr, controlled by ignition timing retard = 0.013 lb/hp-hr  
 Note that the PM10 emission factor in lb/hp-hr is not provided in the Supplement B update of AP-42.  
 An average conversion factor of 1hp-hr = 7,000Btu is provided below.

**Methodology**

Potential Throughput (hp-hr/yr) = hp \* 8760 hr/yr

Emission Factors are from AP 42 (Supplement B 10/96)Table 3.4-1 and Table 3.4-2

1 hp-hr = 7000 Btu, AP42 (Supplement B 10/96), Table 3.3-1, Footnote a.

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] \* 8760 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

\*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included. The PM10 emission factor is filterable and condensable PM10 combined.

	Pollutant					
Emission Factor in lb/hp-hr	Benzene	Toluene	Xylene	Napthalene	Formaldehyde	Acetaldehyde
	9.33E-04	4.90E-04	2.85E-04	8.48E-05	1.18E-03	7.67E-04
Potential Emission in tons/yr	2.29E-02	1.20E-02	6.99E-03	2.08E-03	2.89E-02	1.88E-02
	Total HAPs:					9.17E-02

**Methodology**

Emission Factors from AP-42, Ch. 3.3, Table 3.3-2

Emission (ton/year) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760 (hour/year) x (1 ton/2000 lbs)

**Appendix A: Emission Calculations**  
**Fugitive Emissions From Aggregate Storage**

Page 5 of 7 TSD App A

**Company Name:** VIM Recycling  
**Address City IN Zip:** 29861 Old U.S. Highway 33, Elkhart, Indiana 46516  
**Permit Number:** T039-24536-00538  
**Pit ID:** 039-00538  
**Reviewer:** Anne-Marie C. Hart  
**Date:** November 5, 2007

**Storage Piles**

Equation to determine emission factor:  $Ef = 1.7 (s/1.5) \times (365-p) / 235 \times (f/15)$

s = 8.4 % silt content of material  
p = 125 days of rain greater than or equal to 0.01 inches  
f = 15 % of wind greater than or equal to 12 mph

Ef = 9.72 lb/acre/day

Storage Pile	Acreage	Fugitive Emissions (tons/year)
1	3	5.32
2	2	3.55
3	3	5.32
4	1	1.77
Total		15.97

**Methodology**

Fugitive Emissions (tons/year) = Emission Factor (lb/acre/day) x Acreage of storage pile x 365 days/year x (1 ton/2000 lbs)

**Storage Pile Handling**

Equation to determine emission factor:  $Ef = k \times (0.0032) \times (U/5)^{1.3} / (M/2)^{1.4}$

$k_{PM}$  = 0.74 particle size multiplier  
 $k_{PM10}$  = 0.35 particle size multiplier  
U = 10 mean wind speed, mph  
M = see table moisture content

Storage Pile	Capacity (tons/hr)	Moisture Content (% by weight)	Emission Factor PM (lb/ton)	Emission Factor PM10 (lb/ton)	PM Fugitive Emissions (tons/year)	PM10 Fugitive Emissions (tons/year)
1	75	40	8.80E-05	4.16E-05	0.03	0.01
2	75	14	3.82E-04	1.81E-04	0.13	0.06
3	75	14	3.82E-04	1.81E-04	0.13	0.06
4	75	14	3.82E-04	1.81E-04	0.13	0.06
Total					0.41	0.19

Equation to determine emission factor from AP-42, Ch. 13.2.4, Fifth Edition

**Methodology**

PM Fugitive Emissions (tons/year) = Emission Factor (lb/ton) x Capacity (tons/hr) x 8760 (hr/year) x (1 ton/2000 lbs)

PM10 Fugitive Emissions (tons/year) = Emission Factor (lb/ton) x Capacity (tons/hr) x 8760 (hr/year) x (1 ton/2000 lbs)

**Appendix A: Emission Calculations**  
**Fugitive Emissions From Unpaved Roads**  
**Company Name: VIM Recycling**  
**Address City IN Zip: 29861 Old U.S. Highway 33, Elkhart, Indiana 46516**  
**Permit Number: T039-24536-00538**  
**Plt ID: 039-00538**  
**Reviewer: Anne-Marie C. Hart**  
**Date: November 5, 2007**

Page 6 of 7 TSD App A

## Unpaved Roads

The following calculations determine the amount of emissions created by unpaved roads, based on 8760 hours of use and AP-42, Ch. 12.2.2 (Supplement E, 9/98)

Trips/Hour	Mile/Trip	Number of Trips	Hours/year	Miles/year
150	0.037	2	8760	<b>97236</b>

### PM Emissions

Method:  $E_f = \{k \times [(s/12)^{0.8}] \times [(W/3)^b] / [(M_{dry}/0.2)^c]\} \times [(365 - p) / 365]$

where:

- k = 10 particulate size multiplier for PM
- s = 4.8 mean % silt content of unpaved roads
- b = 0.5 constant for PM
- c = 0.4 constant for PM
- W = 35 tons average vehicle weight
- M<sub>dry</sub> = 10 surface material moisture content, %
- p = 125 number of days with at least 0.254mm of precipitation

E<sub>f</sub> = 2.26 lb/mi

$$2.26 \text{ (lb/mi)} \times 97,236 \text{ (mi/year)} \times (1 \text{ ton}/2000 \text{ lbs}) = \mathbf{109.711 \text{ tons/year}}$$

### PM<sub>10</sub> Emissions

Method:  $E_f = \{k \times [(s/12)^{0.8}] \times [(W/3)^b] / [(M_{dry}/0.2)^c]\} \times [(365 - p) / 365]$

where:

- k = 2.6 particulate size multiplier for PM<sub>10</sub>
- s = 4.8 mean % silt content of unpaved roads
- b = 0.4 constant for PM<sub>10</sub>
- c = 0.3 constant for PM<sub>10</sub>
- W = 35 tons average vehicle weight
- M<sub>dry</sub> = 10 surface material moisture content, %
- p = 125 number of days with at least 0.254mm of precipitation

E<sub>f</sub> = 0.68 lb/mi

$$0.68 \text{ (lb/mi)} \times 97,236 \text{ (mi/year)} \times (1 \text{ ton}/2000 \text{ lbs}) = \mathbf{32.9932 \text{ tons/year}}$$

**Appendix A: Emission Calculations**  
**Fugitive Emissions From Mobark Outdoor Wood Grinder**  
**Woodworking Operations**

Page 7 of 7 TSD App A

**Company Name:** VIM Recycling  
**Address City IN Zip:** 29861 Old U.S. Highway 33, Elkhart, Indiana 46516  
**Permit Number:** T039-24536-00538  
**Plt ID:** 039-00538  
**Reviewer:** Anne-Marie C. Hart  
**Date:** November 5, 2007

Emission Unit	Process	Maximum Throughput Rate (ton/hr)	Emission Factor PM/PM10 (lb/ton)*	PTE PM/PM10 (tons/year)
Mobark	Log Sawing	25.00	0.35	38.33
	Sawdust Handling	0.03	1.00	0.13
<b>Total</b>				<b>38.46</b>

\* Emission Factors from AP-42, Fourth Edition, Volume I, 1985 (Table 10.3-1, 10.3-2, 10.4-1)

**Methodology**

PTE PM/PM10 (tons/year) = Maximum throughput rate (tons/hour) x Emission factor (lb/ton) x 8760 (hour/year) x (1 ton/2000 lbs)